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P&O - projects

Compliance Assessment Report
Ministerial Statement 1218

bp Kwinana Energy Hub

April 2025 - April 2026

Approver:	Erika Harding, KEH director
Approval Date:	22nd June 2026
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Security Classification:	General
Document Number:	ENV-RD-096

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Abbreviations and Acronyms

Term	Definition
CAP	Compliance Assessment Plan
CAR	Compliance Assessment Report
CEO	Chief Executive Officer of Office of the EPA
CTM	Compliance Task Manager tool (compliance action tracker)
GHG	Greenhouse Gas
KRF	Kwinana Renewable Fuels Project
NGERS	National Greenhouse and Energy Reporting Scheme
P&O	Production and Operations

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1 Introduction

On 8th April 2024, BP Refinery (Kwinana) Proprietary Limited received Ministerial approval to develop the Kwinana Renewable Fuels Project (the proposal) under Ministerial Statement 1218 (MS 1218).

The Proposal is still in preconstruction stage.

Table 1 Location and Authorised extent of physical and operational elements

Element	Location	Maximum Extent
Physical Elements		
Overall Extent of the Proposal	Within the development envelope	No clearing within a Development Envelope of 250 ha
Operational Elements		
Renewable Fuels Plant	Within the development envelope	Up to 1,600 m^3 per day
Timing Elements		
Proposal Time	Operation	Up to 20 years
	Decommissioning	Up to 5 years

This Compliance Assessment Report (CAR) has been prepared to document compliance with MS1218 issued for the Kwinana Renewable Fuels Project under EP Act. It has been prepared in accordance with Condition D2-1 of MS1218 and the Office of the Environmental Protection Authority (OEPA) Post Assessment Guideline for Preparing a Compliance Assessment Report, Post Assessment Guideline No 3 (2012).

2 Timing and Reporting

This is the second compliance report submitted under MS1218 and covers the twelve-month period from 8th April 2025 to 8th April 2026.

Subsequent CARs shall be submitted annually on the 8th of July of each year, or as otherwise agreed in writing by the CEO.

3 Summary of Proposal Implementation and Status

To date, the Proponent has not commenced implementation of the Proposal.

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4 Statement of Compliance

4.1 Proposal and Proponent Details

Proposal Title	BP Kwinana Renewable Fuels Project
Statement Number	MS1218
Proponent Name	BP Refinery (Kwinana) Pty Ltd
Proponent's Australian Company Number	008689763

4.2 Statement of Compliance Details

Reporting Period	*8/04/25* to *8/04/26*

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	✓	Construction		Operation		Decommissioning	

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Attachment 2
An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) *Post Assessment Guideline for Preparing an Audit Table*, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 4.3)		Yes (please proceed to Section 4.4)	✓

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4.3 Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

Non-compliance/potential non-compliance 4-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
Was the implementation condition or procedure non-compliant or potentially non-compliant?
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?
☐ Yes ☐ Reported to DWER verbally Date _____ ☐ Reported to DWER in writing Date _____ ☐ No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
What was the cause(s) of the non-compliance or potential non-compliance?
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)

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4.4 Proponent Declaration

I, *Erika Harding, VP Refining Kwinana and Director, Kwinana Energy Hub*

declare that I am authorised on behalf of *BP Refinery (Kwinana) Pty Ltd*

to submit this form and that the information contained in this form is true and not misleading.

Signature: DocuSigned by: Erika Harding BE8D8B20CBA04D0... Date: 25/6/2026 | 05:30 CEST

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

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5 Details of Declared Compliance Status

A summary of compliance with conditions of MS 1218 is outlined in the Audit Table provided in Attachment 2. There have been no non-compliances during the reporting period. The Proposal has not commenced implementation and is still in the pre-construction/planning phase. Attachment 1 explains the Compliance Status terms that are used in Table 2 and Attachment 2 – Audit table.

Table 1 Condition Compliance Status summary

Compliance Status	Abbreviation	Condition Count
Compliant	**C**	**13**
Completed	**CLD**	**2**
Not required at this stage	**NR**	**27**
Potentially non-compliant	**PNC**	
Non-compliant	**NC**	
In Process	**IP**	
Total		**42**

A.1 Attachment 1: Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: • ongoing requirements that have been met during the reporting period; and • requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: • audit elements have a finite period of application (e.g. construction activities, development of a document). • the action has been satisfactorily completed; and • the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	**The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.** The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).

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Attachment 2: Audit Table

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1218:A1-1	Limitations and Extent of Proposal	The proponent must ensure that the proposal is implemented in such a manner that the following limitations or maximum extents / capacities / ranges are not exceeded Maximum extent of development envelope 250 ha Renewable fuels plant capacity = Up to 1,600 m^3 per day Operation duration: Up to 20 years Decommissioning: Up to five years	Implement proposal ensuring that the maximum extents of the elements are not exceeded	Annual CAR Annual throughput data	Overall	Annually Life of the facility	NR	Implementation has not been commenced
1218:B1-1	Greenhouse Gas Emissions	B1-1 Subject to condition B1-1(7), the proponent shall take measures to ensure that net GHG emissions do not exceed: (1) 531,300 tonnes of CO2-e from proposal commencement until 30 June 2030; (2) 410,550 tonnes of CO2-e for the period between 1 July 2030 and 30 June 2035; (3) 289,800 tonnes of CO2-e for the period between 1 July 2035 and 30 June 2040; (4) 169,050 tonnes of CO2-e for the period between 1 July 2040 and 30 June 2045; (5) 48,300 tonnes of CO2-e for the period between 1 July 2045 and the end of the proposal operations and decommissioning, including up until 30 June 2050; (6) zero tonnes of CO2-e for every consecutive five (5) year period from 1 July 2050 onwards, should a proposal time extension be approved; and (7) Where the time between the commencement of operations and the end of a period specified in condition B1-1(1) is less than five (5) years, the net GHG emissions limit for that period is to be determined in accordance with the following formula: Reduced net GHG emissions limit = (A ÷ 1825) x B Where: A is the net GHG emissions limit for the period as specified in condition B1-1. B is the number of days between the commencement of operations and the end of the relevant period specified in condition B1-1.	Implementation of KRF GHG Management Plan Annual GHG monitoring data and calculations based on NGERs methodology	Annual CAR KRF GHG Management Plan Consolidated report, as per condition B1-5(1)	Operation	Life of the facility	NR	Implementation has not been commenced
1218:B1-2(1)	Greenhouse Gas Emissions	**The proponent must implement the Greenhouse Gas Environmental Management Plan to:** (1) be consistent with the achievement of the net GHG emissions limits in condition B1-1 subject to the adjustment provided for in condition B1-1(7) (or achievement of emission reductions beyond those required by those emission limits);	Implementing KRF GHG Management Plan	Annual CAR	Overall	Life of the facility	NR	Implementation has not been commenced
1218:B1-2(2)	Greenhouse Gas Emissions	**The proponent must implement the Greenhouse Gas Environmental Management Plan to**: specify the estimated proposal GHG emissions and emissions intensity for the life of the proposal;	Implementing KRF GHG Management Plan	Annual CAR	Overall	Life of the facility	C	Implementation has not been commenced
1218:B1-2(3)	Greenhouse Gas Emissions	**The proponent must implement the Greenhouse Gas Environmental Management Plan to**: include a comparison of the estimated proposal GHG emissions and emissions intensity for the life of the proposal against other relevant emissions reduction practices, pathways and comparable facilities;	Implementing KRF GHG Management Plan	Annual CAR	Overall	Life of the facility	C	EMP includes comparison for life of the proposal against relevant emissions reduction practices, pathways and comparable facilities other
1218:B1-2(4)	Greenhouse Gas Emissions	**The proponent must implement the Greenhouse Gas Environmental Management Plan to:** identify and describe any measures that the proponent will implement to avoid, reduce and/or offset proposal GHG emissions and/or reduce the emissions intensity of the proposal; and	Implementing KRF GHG Management Plan	Annual CAR	Overall	Life of the facility	C	EMP states measures to avoid, reduce and/or offset proposal GHG emissions
1218:B1-2(5)	Greenhouse Gas Emissions	**The proponent must implement the Greenhouse Gas Environmental Management Plan to:** provide a program for the future review of the plan to: (a) assess the effectiveness of measures referred to in condition B1-2(4); and (b) identify and describe options for future measures that the proponent may or could implement to avoid, reduce, and/or offset proposal GHG emission and/or reduce the emissions intensity of the proposal; (c) consider reasonably practicable options for reductions in scope 3 emissions; and (d) consider reasonably practicable options to achieve net zero scope 2 emissions.	Implementing KRF GHG Management Plan	Annual CAR	Overall	Life of the facility	C	EMP includes process to review the plan

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1218:B1-3	Greenhouse Gas Emissions	Within twenty (20) business days of: (1) any subsequent version of the confirmed Greenhouse Gas Emissions Environmental Management Plan submitted under condition C1-2 which satisfies the requirements of condition B1-2, the proponent must submit a separate summary of the relevant plan to the CEO, which must: (2) include a summary of the matters specified in conditions B1-2(1) to condition B1-2(4); and (3) be published as required by condition B1-7	Prepare and submit a summary of the plan to the CEO by the specified timeframe	Submission of summary in Environment Online	Overall	Life of the facility	NR	EMP was not updated in the reporting period
1218:B1-4	Greenhouse Gas Emissions	The proponent shall submit an annual report to the **CEO** each year by 31 March, commencing on the first 31 March after the **commencement of operations**, or such other date within that financial year as is agreed by the **CEO** to align with other reporting requirements for **GHG**, specifying for the previous financial year: (1) the quantity of **proposal GHG emissions**; and (2) the **emissions intensity** for the proposal.	Submit report to CEO by 31st March each year after the commencement of operations	Email correspondence of reports to CEO	Operation	Annually	NR	Proposal has not commenced operations
1218:B1-5(1)	Greenhouse Gas Emissions	**The proponent shall submit to the CEO by 31 March 2030 or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG, and every five (5) years thereafter:** (1) a consolidated report specifying: (a) for each of the preceding five (5) financial years, the matters referred to in condition B1-4(1) and condition B1-4(2) (b) for the period specified in condition B1-1 that ended on 30 June of the year before the report is due: i. the quantity of **proposal GHG emissions**; ii. the **net GHG emissions**; iii. any measures that have been implemented to avoid or reduce **proposal GHG emissions**; iv. the type, quantity, identification or serial number, and date of retirement or cancellation of any **authorised offsets** which have been retired or cancelled and which have been used to calculate the **net GHG emissions** referred to in condition B1-5(1)(b)(ii), including written evidence of such retirement or cancellation; and v. the amount of **proposal GHG emissions** that have been avoided or reduced through a **Certified Improvement**, including a description of any **Certified Improvement** that caused the avoidance or reduction. vi. a comparison of the **proposal GHG emissions** for the proposal against **international industry best practice** for comparable facilities	Submit 5 yearly report to the CEO by 31st March 2030 and every 5 years thereafter	Email correspondence of reports to CEO	Operation	5 yearly	NR	Proposal has not commenced operations
1218:B1-5(2)	Greenhouse Gas Emissions	**The proponent shall submit to the CEO by 31 March 2030 or such other date within that financial year as is agreed by the CEO to align with other reporting requirements for GHG, and every five (5) years thereafter:** (2) an audit and peer review report of the consolidated report required by condition B1-5(1), carried out by an independent person or independent persons with suitable technical experience dealing with the suitability of the methodology used to determine the matters set out in the consolidated report, whether the consolidated report is accurate and whether the consolidated report is supported by credible evidence.	Engage an independent third party to validate the report	Independent third-party statement or report validating the report	Operation	5 yearly	NR	Proposal has not commenced operations
1218:B1-6(1)	Greenhouse Gas Emissions	**A consolidated report referred to in condition B1-5(1) must be accompanied by**: (1) a revision of the **confirmed Greenhouse Gas Environmental Management Plan** required under condition B1-2 and B1-8; and	Prepare updated KRF GHG Management plan as part of the 5 yearly report	Email correspondence of reports to CEO	Operation	5 yearly	NR	Proposal has not commenced operations

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1218:B1-6(2)	Greenhouse Gas Emissions	**A consolidated report referred to in condition B1-5(1) must be accompanied by:** a separate summary report, for the period specified in condition B1-1 that ended on 30 June of the year before the report is due and any previous periods specified in condition B1-1, and which includes: a. a graphical comparison of net GHG emissions with the net GHG emissions limits detailed in condition B1-1(subject to the adjustment provided for in condition B1-1(7)); b. proposal emissions intensity compared to comparable facilities; c. a summary of measures to reduce the proposal GHG emissions undertaken by the proponent for compliance periods detailed in condition B1-1; and d. a clear statement as to whether limits for net GHG emissions set out in condition B1-1 have been met, and whether future net GHG emissions limits are likely to be met, including a description of any reasons why those limits have not been, and/or are unlikely to be met.	Prepare a separate summary report covering the items in 1218:B1-6(2)	Email or written notification of submission of summary report to CEO	Operation	5 yearly	NR	Proposal has not commenced operations
1218:B1-7	Greenhouse Gas Emissions	In addition to the requirements of condition C1-6 about publication of the **confirmed Greenhouse Gas Environmental Management Plan,** the proponent shall make the summary of the **confirmed Greenhouse Gas Environmental Management Plan**, and all reports required by this condition B1 publicly available on the proponent's website within the timeframes specified below, or in any other manner or time specified by the **CEO**: (1) the summary of the **confirmed Greenhouse Gas Environmental Management Plan** within twenty (20) business days of submitting the document to the **CEO** in accordance with condition B1-3; and (2) the reports referred to in condition B1-4, condition B1-5, and condition B1-6 within twenty (20) business days of submitting the document to the **CEO**, and they shall remain published for the life of the proposal.	Make publicly available the KRF GHG Management Plan, annual CAR, 5 yearly CAR and 5 yearly summary report	Documents are made publicly available within the specified time frames	Overall	Life of the facility	C	EMP has not been updated within the reporting period EMP and CAR available on website Low carbon liquid fuels | bp in Australia | Home
1218:B1-8	Greenhouse Gas Emissions	In addition to the requirements of condition C1-2, the proponent must revise and submit to the **CEO** the **confirmed Greenhouse Gas Environmental Management Plan** by the date that the first five (5) yearly consolidated report is required to be submitted under condition B1-5 and every five (5) years after that date.	The KRF GHG Management will be revised at a minimum at 5 yearly periods and submitted as part of the 5 yearly CAR	Email or written notification of submission of summary report to CEO	Overall	Life of the facility	NR	Proposal has not commenced operations
1218:C1-1	Environmental Management Plans: Conditions Relating to Approval, Implementation, Review and Publication	Upon being required to implement an environmental management plan under Part B, the proponent must: (1) implement the most recent version of the **confirmed** environmental management plan; and (2) continue to implement the **confirmed** environmental management plan referred to in condition C1-1(1), other than for any period which the **CEO** confirms by notice in writing that it has been demonstrated that the relevant requirements for the **confirmed** environmental management plan have been met, or are able to be met under another statutory decision-making process, in which case the implementation of the environmental management plan is no longer required for that period.	Implement KRF GHG Management Plan	Annual CAR KRF GHG Management Plan	Overall	Life of the facility	C	EMP has been implemented as far as practical for pre-implementation
1218:C1-2	Environmental Management Plans: Conditions Relating to Approval, Implementation, Review and Publication	The proponent: (1) may review and revise a **confirmed** environmental management plan provided it meets the relevant requirements of that environmental management plan, including any consultation that may be required when preparing the environmental management plan; (2) must review and revise a **confirmed** environmental management plan and ensure it meets the relevant requirements of that environmental management plan, including any consultation that may be required when preparing the environmental management plan, as and when directed by the **CEO;** and (3) must revise and submit to the **CEO** the **confirmed** environmental management plan if there is a material risk that the **outcomes** or **objectives** it is required to achieve will not be complied with, including but not limited to as a result of a change to the proposal.	KRF GHG MP aligns with Environmental Protection Authority 2024, Instructions: How to prepare Environmental Protection Act 1986 Part IV environmental management plans, EPA, Western Australia	Annual CAR KRF GHG Management Plan	Overall	Life of the facility	NR	EMP has not been updated within the reporting period

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1218:C1-3	Environmental Management Plans: Conditions Relating to Approval, Implementation, Review and Publication	Despite condition C1-1, but subject to conditions C1-4 and C1-5, the proponent may implement minor revisions to an environmental management plan if the revisions will not result in new or increased **adverse impacts** to the environment or result in a risk to the achievement of the limits, **outcomes** or **objectives** which the environmental management plan is required to achieve.	bp may revise and implement the KRF GHG management plan as long as the revisions do not result in new or increase adverse impacts	Annual CAR KRF GHG Management Plan	Overall	Life of the facility	NR	EMP has not been updated within the reporting period
1218:C1-4	Environmental Management Plans: Conditions Relating to Approval, Implementation, Review and Publication	If the proponent is to implement minor revisions to an environmental management plan under condition C1-3, the proponent must provide the **CEO** with the following at least twenty (20) business days before it implements the revisions: (1) the revised environmental management plan clearly showing the minor revisions; (2) an explanation of and justification for the minor revisions; and (3) an explanation of why the minor revisions will not result in new or increased **adverse impacts** to the environment or result in a risk to the achievement of the limits, **outcomes** or **objectives** which the environmental management plan is required to achieve.	Provide the CEO with the revised KRF GHG Management Plan and explanation/justification of the changes within the specified time period	Email or written notification of submission of revised EMP and summary to CEO	Overall	Life of the facility	NR	EMP has not been updated within the reporting period
1218:C1-5	Environmental Management Plans: Conditions Relating to Approval, Implementation, Review and Publication	The proponent must cease to implement any revisions which the **CEO** notifies the proponent (at any time) in writing may not be implemented.	bp will not implement any revisions without CEO approval	Evidence of CEO communication	Overall	Life of the facility	NR	EMP has not been updated within the reporting period
1218:C1-6	Environmental Management Plans: Conditions Relating to Approval, Implementation, Review and Publication	**Confirmed** environmental management plans, and any revised environmental management plans under condition C1-4(1), must be published on the proponent's website and provided to the **CEO** in electronic form suitable for online publication by the Department of Water and Environmental Regulation within twenty (20) business days of being implemented, or being required to be implemented (whichever is earlier).	bp will publish current and revised EMPs on their website.	GHG management plans publicly available within the specified timeframes Submission to the CEO	Overall	Life of the facility	C	Proposal information including approved EMP available on EPA website and Low carbon liquid fuels | bp in Australia | Home
1218:C2-1	Conditions Related to Monitoring	The proponent must undertake monitoring capable of: (1) substantiating whether the proposal limitations and extents in Part A are exceeded; and (2) detecting and substantiating whether the environmental outcomes identified in Part B are achieved (excluding any environmental outcomes in Part B where an environmental management plan is expressly required to monitor achievement of that outcome).	Implement proposal ensuring that the maximum extents of the elements are not exceeded Annual GHG reporting and comparison to MS1218 conditions as per the KRF GHG management plan	Annual CAR	Overall	Life of the facility	NR	Implementation has not been commenced
1218:C2-2	Conditions Related to Monitoring	The proponent must submit as part of the Compliance Assessment Report required by condition D2, a compliance monitoring report that: (1) outlines the monitoring that was undertaken during the implementation of the proposal; (2) identifies why the monitoring was capable of substantiating whether the proposal limitation and extents in Part A are exceeded; (3) for any environmental outcomes to which condition C2-1(2) applies, identifies why the monitoring was scientifically robust and capable of detecting whether the environmental outcomes in Part B are met; (4) outlines the results of the monitoring;	Prepare a compliance monitoring report that outlines the monitoring undertaken, justification of monitoring and results	Submission to the CEO Annual CAR	Overall	Life of the facility	C	2025-2026 CAR has been submitted

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(5) reports whether the proposal limitations and extents in Part A were exceeded and (for any environmental outcomes to which condition C2-1(2) applies) whether the environmental outcomes in Part B were achieved, based on analysis of the results of the monitoring; and (6) reports any actions taken by the proponent to remediate any potential non-compliance.						
1218:D1-1	Non-compliance Reporting	If the proponent becomes aware of a potential non-compliance, the proponent must: (1) report this to the CEO within seven (7) days; (2) implement contingency measures; (3) investigate the cause; (4) investigate environmental impacts; (5) advise rectification measures to be implemented; (6) advise any other measures to be implemented to ensure no further impact; and (7) provide a report to the CEO within twenty-one (21) days of being aware of the potential non-compliance, detailing the measures required in conditions D1-1(1) to D1-1(6) above.	bp will report and investigate all non-compliances as per condition D1-1	Annual CAR Written evidence to CEO of non-compliance	Overall	Life of the facility	NR	There have been no non compliances in the reporting period
1218:D1-2	Non-compliance Reporting	Failure to comply with the requirements of a condition, or with the content of an environmental management plan required under a condition, constitutes a non-compliance with these conditions, regardless of whether the contingency measures, rectification or other measures in condition D1-1 above have been or are being implemented.	bp notes the definition of non compliance under the ministerial statement	Annual CAR showing all non compliances under a condition of KRF GHG Management Plan	Overall	Life of the facility	NR	There have been no non compliances in the reporting period
1218:D2-1	Compliance Reporting	The proponent must provide an annual Compliance Assessment Report to the **CEO** for the purpose of determining whether the implementation conditions are being complied with.	Prepare a CAR annually and submit to CEO	Annual CAR	Overall	Annually	C	2025-2026 CAR has been submitted prior to 8th July 2026
1218:D2-2	Compliance Reporting	Unless a different date or frequency is approved by the **CEO**, the first annual Compliance Assessment Report must be submitted within fifteen (15) months of the date of this Statement, and subsequent reports must be submitted annually from that date.	bp provided the first CAR by 8th July 2025 Subsequent reports are due 8th July each year	Submission of report to the CEO by the due date	Overall	Annual 8th July each year	C	2025-2026 CAR has been submitted prior to 8th July 2026
1218:D2-3	Compliance Reporting	Each annual Compliance Assessment Report must be endorsed by the proponent's Chief Executive Officer, or a person approved by proponent's Chief Executive Officer to be delegated to sign on the Chief Executive Officer's behalf.	CAR will be signed off by KEH director	Annual CAR	Overall	Life of the facility	C	Director has approved the CAR
1218:D2-4	Compliance Reporting	Each annual Compliance Assessment Report must: (1) state whether each condition of this Statement has been complied with, including: a. exceedance of any proposal limits and extents; b. achievement of environmental outcomes; c. achievement of environmental objectives; d. requirements to implement the content of environmental management plans; e. monitoring requirements; f. implement contingency measures; g. requirements to implement adaptive management; and h. reporting requirements; (2) include the results of any monitoring (inclusive of any raw data) that has been required under Part C in order to demonstrate that the limits in Part A, and any outcomes or any objectives are being met; (3) provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance; (4) include the corrective, remedial and preventative actions taken in response to any potential non-compliance; (5) be provided in a form suitable for publication on the proponent's website and online by the Department of Water and Environmental Regulation; (6) be prepared and published consistent with the latest version of the Compliance Assessment Plan required by condition D2-5 which the CEO has confirmed by notice in writing satisfies the relevant requirements of Part C and Part D.	Prepare the annual CAR meeting all conditions in D2-4	Annual CAR	Overall	Annually	C	CAR has been prepared aligning with CAP

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1218:D2-5	Compliance Reporting	The proponent must prepare a Compliance Assessment Plan which is submitted to the **CEO** at least six (6) months prior to the first Compliance Assessment Report required by condition D2-2, or prior to implementation of the proposal, whichever is sooner.	Submit CAP to the CEO by the specified date (6th January 2025)	Email correspondence of CAP report sent to CEO	Pre-construction	6th January 2025 and then as required	CLD	CAP was submitted to EPA in December 2024 and revised with EPA's comments in March 2025.
1218:D2-6	Compliance Reporting	The Compliance Assessment Plan must include: (1) what, when and how information will be collected and recorded to assess compliance; (2) the methods which will be used to assess compliance; (3) the methods which will be used to validate the adequacy of the compliance assessment to determine whether the implementation conditions are being complied with; (4) the retention of compliance assessments; (5) the table of contents of Compliance Assessment Reports, including audit tables; and (6) how and when Compliance Assessment Reports will be made publicly available, including usually being published on the proponent's website within sixty (60) days of being provided to the **CEO**.	Develop Compliance Assessment Plan in accordance with *Post Assessment Guideline for Preparing a Compliance Assessment Plan* and *PAG1 Post Assessment Guideline for Preparing an Audit Table*	Email correspondence of CAP report sent to CEO	Overall	6th January 2025 and then as required	CLD	CAP was submitted to EPA in December 2024 and revised with EPA's comments in March 2025.
1218:D3-1	Contact Details	The proponent must notify the **CEO** of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Written notification to the CEO	Letter to CEO within the specified timeframes	Overall	Life of the facility	NR	No changes have been made to proponent details.
1218:D4-1	Time Limit for Proposal Implementation	The proposal must be **substantially commenced** within five (5) years from the date of this Statement	bp to substantially commence this proposal within 5 years of the date of this statement	Annual CAR CTM task	Construction	Within 5 years	NR	No construction works have been implemented, time limit to implement the proposal is 8 April 2029
1218:D4-2	Time Limit for Proposal Implementation	The proponent must provide to the **CEO** documentary evidence demonstrating that they have complied with condition D4-1 no later than fourteen (14) days after the expiration of period specified in condition D4-1	Prepare written evidence and documents that the proposal has been substantially commenced and submit to CEO	Written documentation and evidence provided to the CEO within the specified time periods	Construction	No later than 14 days after expiry date (8 April 2029)	NR	No construction works have been implemented
1218:D4-3	Time Limit for Proposal Implementation	If the proposal has not been **substantially commenced** within the period specified in condition D4-1, implementation of the proposal must not be commenced or continued after the expiration of that period.	Noted.	CTM task	Construction		NR	No construction works have been implemented
1218:D5-1	Public Availability of Data	Subject to condition D5-2, within a reasonable time period approved by the **CEO** upon the issue of this Statement and for the remainder of the life of the proposal, the proponent must make publicly available, in a manner approved by the **CEO**, all validated environmental data collected before and after the date of this Statement relevant to the proposal (including sampling design, sampling methodologies, monitoring and other empirical data and derived information products (e.g. maps)), environmental management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	bp will publish all validated environmental data used to conform compliance of MS1218 on their website.	Validated Environmental data publicly available within the specified timeframes	Overall	Life of the Facility	C	Proposal information available on EPA website and Low carbon liquid fuels | bp in Australia | Home
1218:D5-2	Public Availability of Data	If: (1) any data referred to in condition D5-1 contains trade secrets; or (2) any data referred to in condition D5-1 contains particulars of confidential information (other than trade secrets) that has commercial value to a person that would be, or could reasonably be expected to be, destroyed or diminished if the confidential information were published, the proponent may submit a request for approval from the **CEO** to not make this data publicly available and the **CEO** may agree to such a request if the **CEO** is satisfied that the data meets the above criteria.	If required, bp will request data to be confidential	Letter to the CEO	Overall	Life of the Facility	NR	No request for public availability of data has been made
1218:D5-3	Public Availability of Data	In making such a request the proponent must provide the **CEO** with an explanation and reasons why the data should not be made publicly available.	If required, bp will request data to be confidential and justify the means	Letter to the CEO	Overall	Life of the Facility	NR	No request for public availability of data has been made.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1218:D6-1	Independent Audit	The proponent must arrange for an independent audit of compliance with the conditions of this Statement, including achievement of the environmental **outcomes** and/or the environmental **objectives** and/ or environmental performance with the conditions of this Statement, as and when directed by the **CEO**.	Independent audit to be done of the environmental outcomes, objectives and performance of MS1218	Independent audit compliance statement and/or report	Overall	As directed by CEO	NR	CEO has not requested for an independent audit
1218:D6-2	Independent Audit	The independent audit must be carried out by a person with appropriate qualifications who is nominated or approved by the **CEO** to undertake the audit under condition D6-1.	bp will engage an independent auditor with the appropriate qualifications to undertake the work	Independent auditor competency statement	Overall	As directed by CEO	NR	CEO has not requested for an independent audit
1218:D6-3	Independent Audit	The proponent must submit the independent audit report with the Compliance Assessment Report required by condition D2-1, or at any time as and when directed in writing by the **CEO**. The audit report is to be supported by credible evidence to substantiate its findings.	Submit the independent audit report to the CEO	Submission of the independent audit report	Overall	As directed by CEO	NR	CEO has not requested for an independent audit
1218:D6-4	Independent Audit	The independent audit report required by condition D6-1 is to be made publicly available in the same timeframe, manner and form as a Compliance Assessment Report, or as otherwise directed by the **CEO**.	bp will publish independent audit reports on their website.	Independent audit reports publicly available within the specified timeframes	Overall	As directed by CEO	NR	CEO has not requested for an independent audit

INITIALS: DS EH